

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA**

**vs**

**JAIME PAULIN RAMIREZ**

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**: CRIMINAL NO. 10-0123-02**

**SUPPLEMENTAL  
MEMORANDUM IN AID OF SENTENCING**

**COMES NOW**, Jaime Paulin Ramirez, by and through counsel, Jeremy H. Gonzalez Ibrahim, and respectfully submits the following supplemental materials:

1. On September 30<sup>th</sup> 2013, Ms. Paulin Ramirez submitted an extensive Memorandum in Aid of Sentencing.

2. Subsequent to that filing, additional material was received by counsel that provides additional objective insight from a third party regarding Ms. Paulin Ramirez.

3. Attached as EXHIBIT P is a letter from Dr. Susan Clampet-Lundquist, Associate Professor at St. Joseph's University discussing Ms. Paulin- Ramirez' participation in an educational program at FDC - Philadelphia entitled "Inside-Out: Exploring Justice Behind the Walls." The time period of this program was the Fall Semester of 2012.

**WHEREFORE**, the defendant, Jaime Paulin Ramirez, humbly prays that this Honorable Court will consider the matters raised above and in the initial Memorandum in Aid of Sentencing in determining the appropriate sentence.

Respectfully submitted,

/s/  
JEREMY H.G. IBRAHIM, ESQUIRE

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the attached motion was served upon the below listed individual(s) via ECF.

AUSA Jennifer Williams  
Matthew Blue, Trial Attorney, USDOJ  
615 Chestnut St.  
Suite 1250  
Philadelphia, PA 19119106

DATE: January 7<sup>th</sup> 2014

/s/  
Jeremy H.G. Ibrahim, Esquire

# EXHIBIT P